

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ELG, a minor by Parent and Next  
Friend LATOREYA TILL,

Case No. 2:24-cv-12195  
Hon. David M. Lawson

Plaintiff,

v.

JUDGE KENNETH KING,  
individually; UNIVERSAL  
PROTECTION SERVICES  
d/b/a ALLIED UNIVERSAL  
SECURITY SERVICES and/or  
ALLIED UNIVERSAL  
SECURITY SERVICES, LLC;  
JOHN DOE COURT OFFICER,  
individually; and JANE ROE  
COURT OFFICER individually,

Defendants.

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**FIEGER, FIEGER, KENNEY  
& HARRINGTON, P.C.**  
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(P65351)  
GARY N. FELTY, JR. (P55554)  
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Protection Service, LLC d/b/a Allied  
Universal Security Services  
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**PLAINTIFF'S REPLY TO DEFENDANTS ALLIED UNIVERSAL SECURITY  
SERVICES LLC AND JANE ROE COURT OFFICER'S AFFIRMATIVE  
DEFENSES**

NOW COMES Plaintiff, ELG, a minor by Parent and Next Friend LATOREYA TILL, by and through her attorneys, FIEGER, FIEGER, KENNEY & HARRINGTON, P.C., and in Answer to Defendants Allied Universal Security Services LLC and Jane Roe Court Officer's Affirmative Defenses hereby states as follows:

1. Denied as untrue.
2. Denied as untrue.
3. Denied as untrue.
4. Denied as untrue.

5. Denied as untrue.
6. Denied as untrue.
7. Denied as untrue.
8. Denied as untrue.
9. Denied as untrue.
10. Denied as untrue.
11. Denied as untrue.
12. Denied as untrue.
13. Denied as untrue.
14. Denied as untrue.
15. Denied as untrue.
16. Denied as untrue.
17. Denied as untrue.
18. Denied as untrue.
19. Denied as untrue.
20. Denied as untrue.
21. Denied as untrue.
22. Denied as untrue.
23. Denied as untrue.

24. Denied as untrue.

25. Denied as untrue.

26. Denied as untrue.

27. Denied as untrue.

28. Denied as untrue.

29. Denied as untrue.

30. Denied as untrue.

31. Denied as untrue.

32. Denied as untrue.

33. Denied as untrue.

34. Denied as untrue.

35. Denied as untrue.

36. Denied as untrue.

37. Denied as untrue.

38. Denied as untrue.

39. Plaintiff neither admits nor denies as this is not an affirmative defense, but an intent.

40. Plaintiff denies that the Defendants may reserve the right to file additional affirmative defenses.

Respectfully submitted,

/s/ Gary N. Felty, Jr.

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Dated: 11/14/2024

**CERTIFICATE OF SERVICE**

I hereby certify that on 11/14/2024, I served this foregoing instrument to all counsel of record and with the Clerk of the Court using the ECF system.

I further hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: N/A

/s/ Gary N. Felty, Jr.

JAMES J. HARRINGTON (P65351)

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